



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Dr. G. A. (Jim) Shirazi, Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

October 14, 1983

Mr. Robert Ruggeri
Attorney
P. O. Box 310
Moab, Utah 84532

RE: Red Rock Mine Plan Review
Tentative Conditional Approval
S & S Mining Company
ACT/037/050
San Juan County, Utah

Dear Mr. Ruggeri:

The Division of Oil, Gas and Mining has reviewed the September 30, 1983 submittal of information by S and S Mining for the Red Rock Mine. While there are still some outstanding deficiencies, the Division has determined that they may be effectively dealt with as conditions of approval. Therefore, pursuant to Title 40-8-13(4) of the Utah Mined Land Reclamation Act, a conditional tentative approval is given. The 30-day public notice will be sent out to the newspapers immediately. During this time period, and prior to the November Board Hearing when final approval may be given, the following commitments and information must be submitted to the Division by November 14, 1983 to satisfy the following conditions:

1. A written commitment to perform soil analysis at the time of reclamation has been given in a September 29, 1983 letter from Robert Ruggeri. This commitment should be clarified to include the analyses specified below: ph; soil texture; electrical conductivity; sodium absorbtion ratio; nitrogen; phosphorous; potassium; sodium; calcium; and, magnesium. These tests had not appeared in previous review letters and are listed here to be attached to your commitment for the sake of clarity.
2. With reference to the Terra Tek lab analyses, the following information is needed:
 - A. substantiation of the electrical conductivity values as presented in the last submission still has not been provided in the form of lab analysis;
 - B. lab reports on the permeability tests have not been received to confirm the values presented in the operator's latest response.

Mr. Robert Ruggeri
ACT/037/050
October 14, 1983
Page Two

3. Calculations for determining the sizing of the evaporation pond are necessary (i.e., ground-water volumes, precipitation values, evaporation rates, etc.). Also, why does the operator anticipate that ground-water interception will decrease as mining progresses?
4. Specific indications of where berms, diversions (e.g., around the waste rock pile), check dams, straw bales, silt fences, vegetative filters or other suitable erosion control measures will be implemented to handle disturbed area drainage have not yet been submitted. These structures, where implemented, should be indicated on the surface facilities maps which should include some overall reference point, e.g., section corner or survey point to tie in with existing maps and plans on file. Preferably, the previously filed maps should be used and revised.

The elimination of the originally proposed lower evaporation pond site as well as the impounded drainage (pond) south of the waste rock pile and the discontinuation of use of the two minor upper ponds when the final evaporation pond is built must be clarified. If approved by the Department of Health, the two minor upper ponds may be used as an alternate overflow site for the large evaporation pond, but total containment must be assured. Final Department of Health approval must be submitted to the Division for all pond construction.

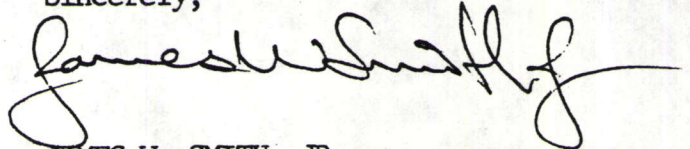
5. (a) Radiometric analysis of the sediment which has been impounded at the retention pond just south of the waste rock pile must be performed and submitted to the Health Department prior to 1984. Should this material be considered hazardous, it will need to be disposed of properly before March 1984.

(b) Sediments collected in the other evaporation ponds will similarly need to be analyzed prior to final reclamation to determine proper disposal procedures.

Mr. Robert Ruggeri
ACT/037/050
October 14, 1983
Page Three

Upon receipt of the information and commitments requested and the completion of their review for adequacy, the Division will present the matter before the Board. As stated previously, it is hoped that this will be accomplished during the next few weeks. If there are any questions, please contact Tom Tetting on the Division staff.

Sincerely,

A handwritten signature in dark ink, appearing to read "James W. Smith, Jr.", with a stylized, flowing script.

JAMES W. SMITH, JR.
COORDINATOR OF MINED
LAND DEVELOPMENT

JWS/TNT:btb

cc: Paul Mortensen, Attorney
Roy Rockwell
Steve McNeal, Department of Health
T. Tetting, DOGM
D. Wayne Hedberg, DOGM
P. Grubaugh-Littig, DOGM
S. Linner, DOGM
T. Portle, DOGM